



The New York Times  
Company

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**VIA ECF**

The Honorable Kiyo A. Matsumoto  
United States District Court  
Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Braun, et al., No. 10-cr-433-KAM — Request to  
Adjourn Briefing Dates

Dear Judge Matsumoto:

I represent The New York Times Company (“The Times”) in its motion to unseal certain court records in this matter. I respectfully make this application with the consent of counsel for the Government and for Mr. Braun.

The Times and Mr. Braun are actively discussing a resolution of this dispute that would obviate the need for adjudication of The Times’s motion. Accordingly, we ask that all briefing deadlines set by the Court in its Order of December 19, 2023 be adjourned by two weeks to allow time for completion of the current discussions. Under the proposed adjourned schedule, responses to The Times’s motion would be due on January 19, 2024 with The Times’s reply due on January 26, 2024. Counsel for Mr. Braun and The Times will notify the Court and the Government on or before January 16, 2024 whether a resolution has been reached and The Times has decided to withdraw its motion.

We thank the Court for its consideration.

Respectfully submitted,

*David McCraw*

David E. McCraw

cc: Counsel of record (by ECF)